

*Attorneys for Plaintiff
Electronic Frontier Foundation*

ELECTRONIC FRONTIER FOUNDATION,
Plaintiff,
v.
DEPARTMENT OF JUSTICE,
Defendant.

Case No. 4:10-cv-04892-RS

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING
DATE FOR PARTIES' RENEWED
CROSS MOTIONS FOR SUMMARY
JUDGMENT**

[Civ. L.R. 6-2]

Date: April 25, 2013
Time: 2:30 p.m.
Place: Ctrm. 3, 17th Floor
Judge: Hon. Richard Seeborg

Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, the parties, by and through undersigned counsel, have conferred and hereby stipulate to and respectfully request the Court grant a continuance to the hearing date for the parties' Renewed Cross Motions for Summary Judgment. The hearing date is currently scheduled for Thursday, April 25, 2013, and the parties request the hearing be continued to Thursday, May 30, 2013.

The parties seek this continuance because Plaintiff's counsel's grandmother passed away today, and plaintiff's counsel needs to travel to be with family and to help her family with the logistics surrounding her grandmother's death. Defendant's counsel's schedule is full with other matters throughout the month of May, and so May 30, 2013 is the first date both counsel will be available.

This requested change will minimally affect the present schedule for the case because the Renewed Cross Motions are fully briefed and because it will only extend the hearing date by about a month.

Respectfully submitted,

DATED: April 19, 2013

/s/ Jennifer Lynch
Jennifer Lynch
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Attorneys for Plaintiff
ELECTRONIC FRONTIER FOUNDATION

DATED: April 19, 2013

/s/ Nicholas Cartier (with permission)
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Attorneys for Defendants

DECLARATION PURSUANT TO LOCAL RULE 5-1

I, Jennifer Lynch, hereby declare pursuant to Local Rule 5-1 that I have obtained Defendant's concurrence in the filing of this document from Nicholas Cartier, Counsel for Defendant.

Executed on April 19, 2013, in San Francisco, California.

/s/ Jennifer Lynch
Jennifer Lynch

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

The Hon. RICHARD SEEBORG
United States District Judge